UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JAN 2 2 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article Number: 7002 0860 0006 5965 1128

Mr. Juan Somoano
Glenn Springs Holdings, Inc.
5005 LBJ Freeway
Dallas, Texas 75244

RE: Interceptor Well System Interim Corrective Measure (ICM) Effectiveness Evaluation, dated December 14, 2009
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas
RCRA ID #KSD007482029

Dear Mr. Somoano:

The Environmental Protection Agency (EPA) Region 7 has reviewed the Occidental Chemical Corporation's (OCC's) Wichita facility revised Interceptor Well ICM Effectiveness Evaluation Report, dated December 14, 2009. The revised report and OCC's responses to EPA comments are approved with the condition that change pages addressing the following additional EPA comments will be incorporated into the document and sent to EPA.

Specific Comments:

1. **Page 6, Section 2.1.2, Historical Waste Disposal:**

   The last paragraph on this page states that the brine and solar ponds received calcium carbonate, magnesium hydroxide, brine water, hydrochloric acid, sulfuric acid and potentially other non-organic liquids. This paragraph must be amended to include hex and benzene hexachloride (BHC) waste disposal in the brine pond area since these wastes were detected in soil samples taken from the brine pond in November 2009 during the Alpha Cake Landfill, Hex Waste Pits & Brine Ponds Phase 1 Investigation.

2. **Page 7, Section 2.1.2, Historical Waste Disposal:**

   The last sentence in the middle paragraph states that process waste, spills or releases in the Truck and Rail Loading Area are directed to sumps which are part of the chemical sewer system. Please revise this sentence to state which sump numbers receive wastes from these

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areas. In addition, please clarify where the wastes from these respective sumps are transferred for permanent disposal. It must be clarified whether these wastes are transferred from the sumps to OCC's deep wells for permanent disposal or via some other mode of permanent disposal.

3. **Page 21, Section 3.5, 2001-Present Shaw Environmental, Inc.:**

The last paragraph states that a total of 18 borings were advanced southward to 71st Street and that 13 samples analyzed using the mobile gas chromatograph (GC) exceeded the Maximum Contaminant Level (MCL) for carbon tetrachloride. However, the results of the confirmation samples sent to the laboratory were all non-detect.

This paragraph is inconsistent with results from EPA's review of site data. EPA identified 21 separate GC samples collected at varying depths in 2007 and 2008 that exceeded the MCL of 5 µg/L for carbon tetrachloride. These exceedances ranged from 5.5 µg/L to 236 µg/L. The fixed laboratory confirmation samples also contained carbon tetrachloride MCL exceedances ranging from non-detect to 626 µg/L. In addition, some of the fixed laboratory confirmation samples were not even analyzed for carbon tetrachloride.

Therefore, OCC must revise this paragraph to accurately state that there were carbon tetrachloride exceedances of the MCL in Section 34, in both GC samples and fixed laboratory samples.

4. **Page 33, Section 5.1.2, Historical Contaminants of Concern (COC):**

The last paragraph recommends the elimination of D-BHC from the COC list and from the list of sample analytes in future groundwater sampling events because there are no regulatory standards for D-BHC, the detection of this contaminant was very limited, and it was detected only once in February 2009.

EPA disagrees with this recommendation and expects this constituent to remain a COC in the current semi-annual groundwater sampling program for the foreseeable future. This contaminant was discovered during the facility's first Appendix 9 sampling event in 2008. According to EPA's last update of eDat data (August 2008), there were 16 detections of D-BHC in OCC wells. EPA agrees with OCC in that there are no current screening levels for D-BHC. However, there are existing screening levels for OCC's other BHC constituents (A-BHC-0.011 micrograms per liter (µg/L), B-BHC-0.037 µg/L, and G-BHC-0.061 µg/L), all of which are below 1 µg/L. Nearly all of the 2008 D-BHC detections exceeded screening levels for the other BHC constituents. Therefore, this constituent needs to be retained in the sampling program.

5. **Page 35, Section 5.4, Chemicals of Focus:**

Since the chemicals 1,1,1-Trichloroethane, 1,2-Dichloropropane, Methyl Chloride and Vinyl Chloride were omitted as Chemicals of Focus for the evaluation of the interceptor well network only, it is EPA's understanding and expectation that these chemicals continue to be

sampled for as part of the facility's semi-annual groundwater sampling event. OCC must also continue to sample for these constituents in any environmental media as well.

6. **Page 76, Section 11.0, Recommendations:**

This paragraph states that additional information is necessary to enhance the groundwater interceptor system evaluation. An assessment of the conditions of the interceptor wells should be completed in the near future as part of the facility's operation and maintenance program. EPA agrees. Change pages must be submitted, stating when this additional assessment will occur, what exactly the assessment will consist of, and how will this information be presented to EPA.

EPA appreciates the efforts of both the Glenn Springs Holding Company and OCC's consultant Conestoga-Rovers & Associates.

Please provide EPA and KDHE revision pages that incorporate EPA's requested information provided herein within 14 days of your receipt of this letter. OCC may provide this information to EPA and KDHE electronically for inclusion into the *Final Interceptor Well System Interim Corrective Measure Effectiveness Evaluation Report,* dated December 14, 2009.

If you have any questions you may reach me at (913) 551-7159 or at Garrett.David@epa.gov.

Sincerely,

David Garrett
Environmental Scientist
RCRA Corrective Action & Permits Branch
Air & Waste Management Division

cc: Lisa Thurman
Occidental Chemicals

Bruce Clegg
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